

1 Erik J. Foley  
Nevada Bar No. 14195  
2 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Pkwy, Suite 600  
3 Las Vegas, NV 89169-5996  
Tel: (702) 949-8200  
4 Email: efoley@lrrc.com

5 *Attorneys for Defendant JE Dunn Construction*  
- *Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use  
and benefit of BOMBARD ELECTRIC, LLC,

Plaintiff,

vs.

JE DUNN CONSTRUCTION  
COMPANY, a Missouri corporation;  
SUSTAINABLE MODULAR  
MANAGEMENT, INC., a Texas corporation;  
HARTFORD FIRE INSURANCE COMPANY,  
a surety; TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA, a surety;  
FEDERAL INSURANCE COMPANY, a surety;  
PACIFIC INDEMNITY COMPANY, a surety;  
DOES 1 through 10; and ROE ENTITIES 11  
through 20, inclusive,

Defendants.

Case No.: 2:20-cv-01200-APG-VCF

Compl. Filed: June 24, 2020

**STIPULATION TO EXTEND  
CERTAIN DEFENDANTS'  
TIME TO RESPOND TO  
COMPLAINT**

**(SECOND REQUEST)**

This Stipulation to Extend Certain Defendants' Time to Respond to Complaint is made by and between Plaintiff United States of America, for the use and benefit of Bombard Electric, LLC ("Plaintiff") and Defendants JE Dunn Construction Company, Hartford Fire Insurance Company, Federal Insurance Company and Travelers Casualty and Surety Company of America ("Defendants") through their respective counsel, in light of the following facts:

RECITALS

A. Plaintiff filed the Complaint (“Complaint”) on or about June 24, 2020.

B. Pursuant to a Stipulation and Order, the current deadline for Defendants to respond to the Complaint is September 3, 2020.

C. All defendants have been served.

D. Multiple claims related to the same subject matter have been filed in both federal and Nevada courts. This stipulation seeks to align Defendants’ response deadline for this Complaint with response deadlines in a related case. Moreover, the additional time will all Defendants time gather the facts necessary to analyze and respond to Plaintiff’s claims, and to coordinate with counsel in the related cases regarding an efficient and coherent litigation approach.

E. The parties have agreed that these Defendants shall have until September 24, 2020, to respond to the Complaint.

F. There is good cause to grant this stipulation because the extension seeks to conserve judicial resources by developing a coherent approach to multiple related cases.

G. This stipulation is filed in good faith and not intended to cause delay.

H. Pursuant to Local Rule IA 6-2, Plaintiff and JE Dunn respectfully request that the Court extend the time for Defendants’, as well as Pacific Indemnity Company’s, time to respond to Plaintiff’s Complaint through September 24, 2020.

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**STIPULATION**

NOW, THEREFORE, Plaintiff and Defendants hereby stipulate and agree that the following defendants have up to and including September 24, 2020, to file a response to Plaintiff's Complaint: (1) JE Dunn Construction Company, (2) Hartford Fire Insurance Company, (3) Travelers Casualty and Surety Company of America, (4) Federal Insurance Company, and (5) Pacific Indemnity Company.

**IT IS SO STIPULATED.**

DATED this 31<sup>st</sup> day of August, 2020.

**WILLIAMS | STARBUCK**

By: /s/ Donald H. Williams

Donald H. Williams  
Nevada Bar No. 5548  
Williams Starbuck  
612 South Tenth Street  
Las Vegas, NV 89101

*Attorneys for Plaintiff*

DATED this 31st day of August, 2020.

**LEWIS ROCA ROTHGERBER  
CHRISTIE LLP**

By: /s/ Erik J. Foley

Erik J. Foley  
Nevada Bar No. 14195  
3993 Howard Hughes Pkwy, Suite 600  
Las Vegas, NV 89169

*Attorneys for Defendants JE Dunn  
Construction Company, Hartford Fire  
Insurance Company, and Travelers  
Casualty and Surety Company*

**ORDER**

IT IS SO ORDERED.

  
United States Magistrate Judge

DATED 9-2-2020